Dominica C. Anderson (SBN 2988) Douglas R. Gooding (admitted *Pro hac vice*) 1 Daniel B. Heidtke (SBN 12975) Jean-Paul Jaillet (admitted *Pro hac vice*) DUANE MORRIS LLP CHOATE, HALL & STEWART LLP 2 100 N. City Parkway, Suite 1560 Two International Place Las Vegas, NV 89106 3 Boston, MA 02110 Telephone: 415.957.3179 Telephone: +1 617.248.5000 Facsimile: 702.974.1058 Facsimile: +1 617.248.4000 4 Email: dcanderson@duanemorris.com Email: dgooding@choate.com dbheidtke@duanemorris.com jjaillet@choate.com 5 Richard F. Holley (SBN 3077) 6 Mary E. Bacon (SBN 12686) SPENCER FANE, LLP 7 300 South Fourth Street, Suite 1600 Las Vegas, Nevada 89101 8 Telephone: 702.408.3400 Facsimile: 702.408.3401 9 Email: rholly@spencerfane.com mbacon@spencerfane.com 10 Attorneys for Plaintiffs Ohio Security Insurance Company, 11 Peerless Indemnity Insurance Company, The Ohio Casualty Insurance Company, and 12 West American Insurance Company 13 UNITED STATES DISTRICT COURT 14 DISTRICT OF NEVADA 15 16 Case No.: 2:25-cv-00399-RFB-EJY OHIO SECURITY INSURANCE COMPANY. 17 $et al..^1$ STIPULATION AND ORDER TO **EXTEND DEADLINE FOR PLAINTIFFS** 18 Plaintiffs, TO FILE REPLY IN SUPPORT OF 19 PLAINTIFFS' MOTION FOR ORDER TO VS. **DEPOSIT FUNDS IN THE COURT'S** 20 AFFINITYLIFESTYLES.COM, INC. d/b/a **REGISTRY (ECF NO. 8)** REAL WATER, et al., 21 (FIRST REQUEST) Defendants. 22 Pursuant to Local Rules IA 6-1, 6-2, and 7-1, IT IS HEREBY STIPULATED AND 23 **AGREED** between Certain Defendants, by and through their counsel of record, and Plaintiffs Ohio 24 25 Security Insurance Company, Peerless Indemnity Insurance Company, The Ohio Casualty Insurance

26

27

28

¹ Pursuant to Federal Rules of Civil Procedure 10(a), the caption has been abbreviated. The full caption is set forth in the Complaint at ECF No. 1.

² Certain Defendants include: Agnes Aleksander, Yvonne Arnone, Niegal Davis-Richard, Tina Hartshorn, Tiquionte Henry, Lela Kaveh, Ginger Land-Van Buuren, Lorenzo Muniz, Cheryl Nally, Patricia Sutherland, as Heir of Kathleen Mustain Ryerson, Daniel Taylor, Daisy Wei, Christopher Noah Wren, Christopher Brian Wren, and Emely Wren.

2

1

45

67

8

10

11

12

1314

1516

17

18 19

20

21

2223

2425

///

///

///

///

26

27

28 ||

Company, and West American Insurance Company (collectively "Plaintiffs"), by and through their counsel of record, that Plaintiffs shall have additional time to file their *Reply In Support of the Motion for Order to Deposit Funds in the Court's Registry* ("Reply"). Accordingly, the Parties hereby stipulate, agree and respectfully request that the Court extend the deadline to file the Reply, and state as follows:

- 1. Pursuant to the Stipulation and Order to Extend the Deadline for Defendants to File an Opposition to Plaintiffs' Motion for Order to Deposit Funds in the Court's Registry ("Opposition Stipulation"; ECF No. 82), on April 2, 2025, Certain Defendants filed their Opposition to Plaintiffs Motion to [sic] for Order to Deposit Funds in the Court's Registry ("Opposition to Motion to Deposit"). (ECF No. 86.)
 - 2. Pursuant to Local Rule 7-2(b), Plaintiffs' Reply is currently due on April 9, 2025.
- 3. Pursuant to the Opposition Stipulation, on April 2, 2025, Certain Defendants also filed a *Motion to Dismiss Plaintiffs' Complaint in Interpleader, or, in the Alternative, Motion to Stay* ("Motion to Dismiss"). (ECF No. 85.)
- 4. Pursuant to Local Rule 7-2(b), Plaintiffs' deadline to file a response to the Motion to Dismiss is April 16, 2025.
- 5. Because there is overlap between the arguments raised in Certain Defendants' Opposition to Motion to Deposit and those raised in Certain Defendants' Motion to Dismiss, the Parties agree that good cause exists to extend Plaintiffs' deadline to file the Reply in Support of their Motion to Deposit to the same date as their deadline to file a response to the Motion to Dismiss, i.e., April 16, 2025.
- 6. Accordingly, the Parties agree and respectfully request that the Court enter an order extending the deadline to file the Reply in Support of Plaintiffs' Motion for Order to Deposit Funds in the Court's Registry.

1	7. The Parties request that the Court enter an order establishing April 16, 2025 as the	
2	new deadline for Plaintiffs to file their Reply in Support of Plaintiffs' Motion for Order to	
3	Deposit Funds in the Court's Registry.	
4	8. This is the first stipulation for ext	tension of time for Plaintiffs to file a Reply.
5	DATED this 8th day of April, 2025	DATED this 8th day of April, 2025
6	• • •	•
7	DUANE MORRIS LLP	KEMP JONES, LLP
8	By:/s/ Dominica C. Anderson	By: <u>/s/ Eric Pepperman</u> WILL KEMP, ESQ., NV Bar No. 1205
9	Dominica C. Anderson (SBN 2988) Daniel B. Heidtke (SBN 12975)	ERIC PEPPERMAN, ESQ., NV Bar No. 11679 BREANNA SWITZLER, ESQ., NV Bar No.
10	—and—	15653 KEMP JONES, LLP 3800 HOWARD HUGHES PARKWAY, 17 TH
11	SPENCER FANE, LLP	FLOOR
12	Richard F. Holley (SBN 3077)	LAS VEGAS, NEVADA 89169
13	Mary E. Bacon (SBN 12686)	Attorneys for Defendants Agnes Aleksander, Yvonne Arnone, Niegal Davis-
14	—and—	Richard, Tina Hartshorn, Tiquionte Henry, Lela Kaveh, Ginger Land-Van Buuren,
15	CHOATE, HALL & STEWART LLP	Lorenzo Muniz, Cheryl Nally, Patricia Sutherland, as Heir of Kathleen Ryerson,
16	Douglas R. Gooding (admitted <i>pro hac vice</i>) Jonathan D. Marshall (admitted <i>pro hac vice</i>)	Daniel Taylor, Daisy Wei, Christopher Noah Wren, Christopher Brian Wren, and
17	Attorneys for Plaintiffs Ohio Security	Emely Wren
18	Insurance Company, Peerless Indemnity Insurance Company, The Ohio Casualty	
19	Insurance Company, and West American Insurance Company	
20		
21		
22	IT IS SO ORDERED.	
23		
24	Clayno I Zouchak	
25	UNITED STATES MAGISTRATE JUDGE	
26	DATED: April 8, 2025	
27		

28